



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
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NEW YORK, NY 10007-1866

APR 27 2007

Oscar Diaz, Refuge Manager
Vieques National Wildlife Refuge
Vieques Office Park
Road 200, KM 0.04
Vieques, PR 00765

Class: LO

Dear Mr. Diaz:

The Environmental Protection Agency (EPA) has reviewed the draft Comprehensive Conservation Plan/Environmental Impact Statement (CCP/EIS) (CEQ # 20070067) for the Vieques National Wildlife Refuge, pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Vieques National Wildlife Refuge was created from former Navy managed lands by congressional actions in 2001 and 2003. The Refuge consists of approximately 17,771 acres – 3,100 acres on western Vieques and 14,671 acres on eastern Vieques. The refuge lands were historically used for agricultural purposes and more recently for military training activities. As a result of the military training, the wildlife habitats and communities are significantly altered with non-native invasive species now existing along with remnants of native habitants. In addition, portions of the refuge contain unexploded ordnance and other contaminants that are classified as a "superfund site" under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Cleanup of these portions is being conducted by the Navy in accordance with CERCLA and in accordance with a Federal Facilities Agreement between the Navy, U.S. EPA, U.S. Fish and Wildlife Service (USFWS), and the Commonwealth of Puerto Rico.

In accordance with the National Wildlife Refuge System Improvement Act of 1997 (Public Law 105-97), the draft CCP/EIS addresses problems that may adversely affect the populations and habitats of fish, wildlife, and plants and proposes the actions necessary to correct or mitigate such problems over a period of 15 years. Specifically, the CCP/EIS seeks to (1) ensure biological integrity, diversity and environmental health of refuge habitants; (2) restore degraded forest, coastal and wetland habitants; (3) evaluate and manage visitor use; and (4) ensure that the clean-up of the refuge is adequate to protect the environment, the fish and wildlife resources, and the visitors to the refuge.

Three alternatives are considered in the draft CCP/EIS: Alternative A would maintain the current management direction and use of the refuge; Alternative B would expand wildlife and habitat management but maintain the existing visitor programs and public uses; and Alternative C provides for both habitat management and public use by addressing the needs of resources, and where appropriate and compatible with the refuge purposes, the needs of the community. The draft EIS identifies Alternative C, which focuses upon habitat management and public use emphasis, as the environmentally preferred alternative for the refuge. EPA is supportive of

Alternative C as the preferred alternative because it provides for a realistic and achievable strategy for the restoration of the refuge habitats without diminishing the wildlife values associated with current conditions, and seeks to implement management activities that will benefit threatened and endangered species. Alternative C also seeks to expand priority public uses in the refuge as identified in the National Wildlife Refuge System Improvement Act of 1997 and to permit other public uses that are determined to be appropriate and compatible with the refuge mission. In addition, the Fish and Wildlife Service would provide for management activities and limited public uses on portions of the currently closed area, as well as within the currently open areas.

The implementation of Alternative C by the Fish and Wildlife Service will help to protect human health and the environment. The document states on pages 105 and 162 that prior to opening any new areas for resource management or public uses, certification that the areas are cleared of unexploded ordnance or other contaminants would be required under Alternative C. We are also pleased that in addition to the existing unexploded ordnance and other potential contaminants being cleaned under the "Superfund" program that the Fish and Wildlife Service will apply the Best Management Practices to all habitat improvement projects such as providing sanitary facilities, regulating public use activities, and will strictly adhere to label requirements for the application of any pesticides. We do recommend that a copy of the "Federal Facilities Agreement" between the Navy, U.S. EPA, Fish and Wildlife Service and the Commonwealth of Puerto Rico be included in the Appendices section of the final CCP/EIS or that information be made available in the final CCP/EIS so that the public may retrieve a copy of the document if so desired.

With these considerations in mind, EPA does not believe that implementation of the CCP/EIS would result in significant adverse impacts to the environment and accordingly has no objections at this time to its implementation. We appreciate this opportunity to review and comment on this draft CCP/EIS. Should you have any questions concerning this letter, please contact me at (212) 637-3504, or Grant Jonathan at (212) 637-3843.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John Filippelli", is written over a horizontal line.

John Filippelli, Chief
Strategic Planning and Multi-Media Programs Branch

cc: James Oland, FWS